

EXHIBIT 35

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CISCO SYSTEMS, INC.,)
)
Plaintiff,)
) Case No.
vs.) 5:14-cv-05344-BLF (PSG)
)
ARISTA NETWORKS, INC.)
)
Defendant.)
)
_____)

*** HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY ***

VIDEOTAPED DEPOSITION OF BALAJI VENKATRAMAN
Palo Alto, California
Tuesday, May 2, 2016
Volume I

Reported by:
CARLA SOARES
CSR No. 5908
Job No. 2302931
Pages 1 - 116

Page 1

1 MR. SANTACANA: Eduardo Santacana of Keker
2 & Van Nest. I represent the defendant, Arista
3 Networks.

4 MR. WONG: Ryan Wong from Keker & Van Nest
5 for Arista Networks.

6 MR. HOLMES: Drew Holmes with Quinn
7 Emanuel of behalf of Cisco.

8 MR. GARTEN: Tom Garten of Covington &
9 Burling for the witness and HP Enterprise.

10 MS. JOHNSON: Angela Johnson for HP
11 Enterprise.

12 THE VIDEO OPERATOR: Thank you.

13 Will the certified court reporter please
14 swear in the witness.

15 BALAJI VENKATRAMAN
16 having been administered an oath, was examined and
17 testified as follows:

18 EXAMINATION

19 BY MR. SANTACANA:

20 Q Good morning, sir. Could you please state
21 your full name for the record?

22 A Balaji Venkatraman.

23 Q Could you spell that?

24 A B-A-L-A-J-I, V-E-N-K-A-T-R-A-M-A-N.

25 Q Who is your current employer?

1 Q How does it query the devices that it
2 finds in the network?

3 A So various mechanisms. It opens a Telnet
4 connection and executes a set of standard show
5 commands to identify what those device types are.

6 Q When you say that it executes commands,
7 it's executing CLI commands?

8 A Correct.

9 Q And then it reads the response from the
10 network element after it executes a show command?

11 A Correct.

12 Q When you say that they are standard show
13 commands, what do you mean?

14 A So most -- in the configuration of a
15 network element, there are some commands that one
16 could execute to understand what the device type is
17 and the OS version that is running on it. Those are
18 very generic. They're CLI or mechanisms like SNMP.
19 Those are very generic commands.

20 And then based on that, other
21 configuration commands may be appropriate.

22 Q How does a product know which show
23 commands to execute, or are you saying that they're
24 all the same?

25 A So in -- before a command is executed, the

1 A Yes.

2 Q How does a user of Network Automation
3 indicate which mode it should be executed in?

4 A By enabling the password. To make -- if
5 there's a script to read the configuration, then it
6 would -- a non-privileged access is sufficient.

7 If the script is going to change something
8 in the configuration, then the privileged mode needs
9 to have -- the product needs to be in the privileged
10 mode by presenting appropriate credentials.

11 So it depends on the operation.

12 Q Do all third-party switches have
13 privileged modes?

14 A Most do.

15 Q Do you know if Arista's switches have a
16 privileged mode?

17 A I believe they do.

18 Q Cisco's?

19 A Yes.

20 Q Juniper's?

21 A I believe they do.

22 Q If you could turn to Appendix C, which
23 begins with the Bates number ending in 947. All the
24 way in the back.

25 A Okay.

1 vendor's products or could it be used across
2 vendors?

3 A Depending on the command, it could be
4 across vendors.

5 Q And so those -- if a device family is used
6 across vendors, that's because they also have
7 similar CLI command syntax?

8 A That is correct.

9 Q Do you know whether HP's Network
10 Automation customers use device families across more
11 than one vendor?

12 A I don't know how our customers use that.
13 The capability is there so that if the CLI is common
14 or consistent across different vendors, then that
15 script can be used.

16 Q Are you aware of common CLI that vendors
17 share with each other?

18 A I don't know how vendors share anything
19 with each other.

20 Q I'm sorry. Let me rephrase the question.
21 Are you aware of different vendors having
22 common CLI?

23 A Yes, there are common elements to CLI from
24 different vendors.

25 Q Including particular commands and syntax?

1 A Including commands and syntax.

2 Q Are you aware of any particular ones?

3 A Example might be show configuration. It
4 could be show config, show configuration. Similar,
5 consistent user that reads that command knows how to
6 parse it.

7 Q Could you flip to page 120, which has a
8 Bates number of HPE84218?

9 A Okay. I'm there.

10 Q This page discusses device drivers, which
11 we've discussed briefly before.

12 A Um-hum.

13 Q And in that first paragraph, it says, "The
14 Drivers page displays a list of the installed
15 drivers on your system and the number of drivers
16 currently in use. The Drivers page enables you to
17 determine which" -- Network Automation or -- "NA
18 drivers were built in-house or endorsed by HP, and
19 as a result are supported by HP."

20 Does HP develop device drivers in-house?

21 A Yes.

22 Q And has it been doing that since the time
23 that Cisco licensed the product?

24 A Yes.

25 Q Does it also endorse device drivers

1 point says, "Industry-standard CLI with a
2 hierarchical structure" as the -- as one of the
3 features of this switch, and underneath it says,
4 "Reduces training time and expenses, and increases
5 productivity in multi-vendor installations."

6 A Right.

7 Q Do you have an understanding of what the
8 industry standard CLI with a hierarchical structure
9 is?

10 A Yes.

11 Q What is that?

12 A So as we discussed earlier, the reason to
13 have common, consistent-looking CLI across different
14 vendors and different device types for the devices
15 to present a common interface is because users can
16 leverage the learning on one device to another
17 device, another class of device.

18 So in the interest of helping our
19 customers, Hewlett-Packard also implements CLI that
20 is accepted industry standard so that we minimize
21 the amount of time customers have to spend learning
22 our -- our CLI.

23 Q Is the industry standard CLI that HP
24 implements to help its customers with training time
25 and expenses, is that a set of specific commands?

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8 I, BALAJI VENKATRAMAN, do hereby declare
9 under penalty of perjury that I have read the
10 foregoing transcript; that I have made any
11 corrections as appear noted, in ink, initialed by
12 me, or attached hereto; that my testimony as
13 contained herein, as corrected, is true and correct.

14 EXECUTED this _____ day of _____,
15 2016, at _____, _____.
16 (City) (State)

17
18
19 _____
20 BALAJI VENKATRAMAN
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1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were administered an oath; that
8 a record of the proceedings was made by me using
9 machine shorthand which was thereafter transcribed
10 under my direction; that the foregoing transcript is
11 a true record of the testimony given.

12 Further, that if the foregoing pertains to
13 the original transcript of a deposition in a Federal
14 Case, before completion of the proceedings, review
15 of the transcript [X] was [] was not requested.

16 I further certify I am neither financially
17 interested in the action nor a relative or employee
18 of any attorney or any party to this action.

19 IN WITNESS WHEREOF, I have this date
20 subscribed my name.

21
22 Dated: 05/13/2016

23 
24

25 CARLA SOARES

CSR No. 5908